

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

MOVEMENT MORTGAGE, LLC

Plaintiff,

v.

DERAN PENNINGTON, CHRIS SHELTON,
MATT SCHOOLFIELD, LINDA PLYMALE,
HEATHER FRYE, JOSH COVETT and
SUMMIT FUNDING, INC.,
Defendants.

Civil Action No. 3:23-cv-00633

**MOVEMENT MORTGAGE’S
MOTION TO COMPEL**

Plaintiff Movement Mortgage, LLC (“Movement” or “Plaintiff”) respectfully moves this Court, for the reasons set forth in the accompanying Memorandum of Law, which is incorporated herein by reference, to compel Defendants Deran Pennington, Chris Shelton, Matt Schoolfield, Linda Plymale, Heather Frye, Josh Covett, and Summit Funding, Inc. (together, “Defendants”) to supplement their discovery responses, produce all responsive documents, provide a privilege log, and award Plaintiff its fees in bringing this Motion.

Respectfully submitted this 26th day of June, 2024.

Signatures on following page.

Respectfully submitted,

By: /s/ Ari Karen

Ari Karen, Esq.

V. Amanda Witts, Esq.

Sean D. Harding, Esq.

MITCHELL SANDLER PLLC

1120 20th Street NW, Suite 725

Washington, D.C. 20036

akaren@mitchellsandler.com

v.awitts@mitchellsandler.com

sharding@mitchellsandler.com

/s/ G. Bryan Adams, III

G. Bryan Adams, III (N.C. Bar No. 17307)

C. Grainger Pierce, Jr. (N.C. Bar No. 27305)

VAN HOY, REUTLINGER, ADAMS &
PIERCE, PLLC

737 E. Boulevard

Charlotte, NC 28203

Telephone: 704-375-6022

Fax: 704-375-6024

Bryan.adams@vraplaw.com

Grainger.pierce@vraplaw.com

Counsel for Plaintiff

Movement Mortgage, LLC

CERTIFICATE OF SERVICE

The undersigned attorney, being duly sworn on oath, states that she caused a copy of the foregoing to be served upon all counsel of record listed below via ECF on June 26, 2024.

/s/ V. Amanda Witts

V. Amanda Witts